

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

DEFENDANTS' EXHIBIT LIST

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc., by counsel and in accordance with Fed. R. Civ. P. 26(a)(3)(A)(iii) and this Court's December 7, 2016 Order (Dkt. 125), submit their list of exhibits¹ as follows:

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
1.	Rosy Giron de Reyes' Response to Interrogatory 8				
2.	Ruth Rivas' Response to Interrogatory 8				
3.	Yovana Jaldin Solis' Response to Interrogatory 8				
4.	Rosa Elena Amaya's Response to Interrogatory 8				
5.	Jose Dagoberto Reyes' Response to Interrogatory 9				
6.	Felix Alexis Bolanos' Response to Interrogatory 9				

¹ An asterisk next to any exhibit indicates that, pursuant to Fed. R. Civ. P. 26(a)(3)(A)(iii), the exhibit may be offered only if the need arises.

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
7.	Esteban Ruben Moya Yrapura's Response to Interrogatory 9				
8.	Herbert David Saravia-Cruz's Response to Interrogatory 9				
9.	Rosy Giron de Reyes' Responses to Defendants' Requests for Admission 1, 7, 9, 10, 11, 13, 18, 19, 20, 21, 22, 23, 24	Ex. 1A to Defendants' MSJ			
10.	Rosy Giron de Reyes' Amended Responses to Defendants' Requests for Discovery	Ex. 1B to Defendants' MSJ			
11.	Plaintiff Ruth Rivas' Responses to Defendants' Requests for Admission 1, 7, 9, 10, 11, 13, 18, 19, 20, 21, 22, 23, 24	Ex. 2A to Defendants' MSJ			
12.	Plaintiff Ruth Rivas' Amended Responses to Defendants' Requests for Discovery	Ex. 2B to Defendants' MSJ			
13.	Plaintiff Yovana Jaldin Solis' Responses to Defendants' Requests for Admission 1, 7, 9, 10, 11, 13, 18, 19, 20, 21, 22, 23, 24	Ex. 3A to Defendants' MSJ			
14.	Plaintiff Yovana Jaldin Solis' Amended Responses to Defendants' Requests for Discovery	Ex. 3B to Defendants' MSJ			
15.	Plaintiff Rosa Elena Amaya's Responses to Defendant's Requests for Admission 1, 7, 9, 10, 11, 13, 18, 19, 20, 21, 22, 23, 24	Ex. 4A to Defendants' MSJ			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
16.	Plaintiff Rosa Elena Amaya's Amended Responses to Defendant's Requests for Discovery	Ex. 4B to Defendants' MSJ			
17.	Plaintiff Jose Dagoberto Reyes' Responses to Defendants' Requests for Admission 3, 7, 9, 10, 11, 14, 19, 20, 21, 22, 23, 24, 25	Ex. 5A to Defendants' MSJ			
18.	Plaintiff Jose Dagoberto Reyes' Amended Responses to Defendants' Requests for Discovery	Ex. 5B to Defendants' MSJ			
19.	Plaintiff Jose Dagoberto Reyes' Amended Responses to Defendants' Requests for Admission 4, 5, 15	Ex. 5C to Defendants' MSJ			
20.	Plaintiff Felix Alexis Bolanos' Responses to Defendants' Requests for Admission 3, 7, 9, 10, 11, 14, 19, 20, 21, 22, 23, 24, 25	Ex. 6A to Defendants' MSJ			
21.	Plaintiff Felix Alexis Bolanos' Amended Responses to Defendants' Requests for Discovery	Ex. 6B to Defendants' MSJ			
22.	Plaintiff Felix Alexis Bolanos' Amended Responses to Defendants' Requests for Admission 4, 5, 15	Ex. 6C to Defendants' MSJ			
23.	Plaintiff Esteban Ruben Moya Yrapura's Responses to Defendants' Requests for Admission 3, 7, 9, 10, 11, 14, 19, 20, 21, 22, 23, 24, 25	Ex. 7A to Defendants' MSJ			
24.	Plaintiff Esteban Ruben Moya Yrapura's Amended Responses to Defendants' Requests for Discovery	Ex. 7B to Defendants' MSJ			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
25.	Plaintiff Esteban Ruben Moya Yrapura's Amended Responses to Defendants' Requests for Admission 4, 5, 15	Ex. 7C to Defendants' MSJ			
26.	Plaintiff Herbert David Saravia Cruz's Responses to Defendants' Requests for Admission 3, 7, 9, 10, 11, 14, 19, 20, 21, 22, 23, 24, 25	Ex. 8A to Defendants' MSJ			
27.	Plaintiff Herbert David Saravia's Amended Responses to Defendants' Requests for Discovery	Ex. 8B to Defendants' MSJ			
28.	Plaintiff Herbert Saravia's Amended Responses to Defendants' Requests for Admission 4, 5, 15	Ex. 8C to Defendants' MSJ			
29.	Mr. Reyes' Application for Residency	Ex. 17 to Defendants' MSJ; WAPLES00000511			
30.	Mr. Reyes' Lease, dated 5/31/13	Ex. 21A to Defendants' MSJ; WAPLES00000484-485			
31.	Mr. Reyes' Lease, dated 5/28/14	Ex. 21B to Defendants' MSJ; WAPLES00000433-436			
32.	Mr. Reyes' Mobile Home Park Rules and Regulations, dated 5/31/13	Ex. 25A to Defendants' MSJ; WAPLES00000486-495			
33.	Mr. Reyes' Park Policies, Rules and Regulations	Ex. 25B to Defendants' MSJ; WAPLES00000438-442			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
34.	TPS Application by Mr. Reyes	GIRON00001547-1550			
35.	2001 TPS Application by Mr. Reyes	GIRON00001440-1445			
36.	2001 Application for Employment Authorization by Mr. Reyes	GIRON00001441			
37.	2006 TPS Application by Mr. Reyes	J. Reyes Dep. Ex. 2; GIRON00001453-1456			
38.	2006 Application for Employment Authorization by Mr. Reyes	GIRON00001452			
39.	2007 TPS Application by Mr. Reyes	GIRON00001459-1462			
40.	2007 Application for Employment Authorization by Mr. Reyes	GIRON00001458			
41.	2008 TPS Application by Mr. Reyes	GIRON00001467-1472			
42.	2008 Application for Employment Authorization by Mr. Reyes	GIRON00001465			
43.	2010 TPS Application by Mr. Reyes	GIRON00001477-1482			
44.	2010 Application for Employment Authorization by Mr. Reyes	GIRON00001476			
45.	2012 TPS Application by Mr. Reyes	GIRON00001492-1497			
46.	2012 Application for Employment Authorization by Mr. Reyes	GIRON00001500-1501			
47.	2013 TPS Application by Mr. Reyes	GIRON00001511-1515			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
48.	2013 Application for Employment Authorization by Mr. Reyes	GIRON00001510			
49.	2015 TPS Application by Mr. Reyes	GIRON00001521-1531			
50.	2015 Application for Employment Authorization by Mr. Reyes	GIRON00001520			
51.	2016 TPS Application by Mr. Reyes	GIRON00001534-1544			
52.	2016 Application for Employment Authorization by Mr. Reyes	GIRON00001545			
53.	Mr. Bolanos' Application for Residency	Ex. 18 to Defendants' MSJ; WAPLES000000115			
54.	Mr. Bolanos' Lease, dated 3/28/12	Ex. 22A to Defendants' MSJ; WAPLES000000082-83			
55.	Mr. Bolanos' Lease, dated 5/7/13	Ex. 22B to Defendants' MSJ; WAPLES000000080-81			
56.	Mr. Bolanos' Lease, dated 3/25/14	Ex. 22C to Defendants' MSJ; WAPLES000000077-79			
57.	Mr. Bolanos' Lease, dated 3/20/15	Ex. 22D to Defendants' MSJ; WAPLES000000051-53			
58.	Mr. Bolanos' Mobile Home Park Rules and Regulations, dated 3/28/12	Ex. 26A to Defendants' MSJ; WAPLES000000092-101			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
59.	Mr. Bolanos' Park Policies Rules and Regulations, dated 3/25/14	Ex. 26B to Defendants' MSJ; WAPLES00000086-91			
60.	Mr. Bolanos' Park Policies Rules and Regulations	Ex. 26C to Defendants' MSJ; WAPLES00000056-61			
61.	TPS Application by Mr. Bolanos	GIRON00001285-1288			
62.	Application for Employment Authorization Mr. Bolanos	GIRON00001283			
63.	TPS Application by Mr. Bolanos	GIRON00001290-1293			
64.	Application for Employment Authorization Mr. Bolanos	GIRON00001294			
65.	2002 TPS Application by Mr. Bolanos	GIRON00001274-1277			
66.	2002 Application for Employment Authorization Mr. Bolanos	GIRON00001278			
67.	2007 TPS Application by Mr. Bolanos	GIRON00001300-1303			
68.	2007 Application for Employment Authorization Mr. Bolanos	GIRON00001305			
69.	2008 TPS Application by Mr. Bolanos	GIRON00001309-1314			
70.	2008 Application for Employment Authorization Mr. Bolanos	GIRON00001308			
71.	2010 TPS Application by Mr. Bolanos	GIRON00001321-1326			
72.	2010 Application for Employment Authorization Mr. Bolanos	GIRON00001327			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
73.	2012 TPS Application by Mr. Bolanos	GIRON00001331-1336			
74.	2012 Application for Employment Authorization Mr. Bolanos	GIRON00001330			
75.	2013 TPS Application by Mr. Bolanos	GIRON00001342-1347			
76.	2013 Application for Employment Authorization Mr. Bolanos	GIRON00001348			
77.	2015 TPS Application by Mr. Bolanos	GIRON00001353-1363			
78.	2015 Application for Employment Authorization Mr. Bolanos	GIRON00001364			
79.	2016 TPS Application by Mr. Bolanos	GIRON00001374-1384			
80.	2016 Application for Employment Authorization Mr. Bolanos	GIRON00001371			
81.	Mr. Bolanos and Ms. Rivas' 2012 Tax Return	R. Rivas Dep. Ex. 11; GIRON00000894-901			
82.	Mr. Bolanos and Ms. Rivas' 2013 Tax Return	R. Rivas Dep. Ex. 12; GIRON00000902-911			
83.	Mr. Bolanos and Ms. Rivas' 2014 Tax Return	R. Rivas Dep. Ex. 13; GIRON00000912-927			
84.	Mr. Bolanos and Ms. Rivas' 2015 Tax Return	R. Rivas Dep. Ex. 14; GIRON00000928-939			
85.	Mr. Moya's Application for Residency	Ex. 19 to Defendants' MSJ; WAPLES00000974-975			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
86.	Mr. Moya's Lease, dated 1/18/11	Ex. 23A to Defendants' MSJ; WAPLES00000920-921			
87.	Mr. Moya's Lease, dated 2/1/12	Ex. 23B to Defendants' MSJ; WAPLES00000918-919			
88.	Mr. Moya's Lease, dated 2/1/13	Ex. 23C to Defendants' MSJ; WAPLES00000916-917			
89.	Mr. Moya's Lease, dated 1/16/14	Ex. 23D to Defendants' MSJ; WAPLES00000897-899			
90.	Mr. Moya's Lease, dated 12/4/14	Ex. 23E to Defendants' MSJ; WAPLES00000840-842			
91.	Mr. Moya's Mobile Home Park Rules & Regulations, dated 1/18/11	Ex. 27A to Defendants' MSJ; WAPLES00000922-927			
92.	Mr. Moya's Mobile Home Park Rules and Regulations, dated 1/16/14	Ex. 27B to Defendants' MSJ; WAPLES00000902-911			
93.	Mr. Moya's Park Policies, Rules and Regulations, dated 12/4/14	Ex. 27C to Defendants' MSJ; WAPLES00000845-850			
94.	Mr. Moya and Ms. Solis' 2004 Tax Return	Y. Solis Dep. Ex. 4; GIRON00001108-1109			
95.	Ms. Solis' 2005 Tax Return*	Y. Solis Dep. Ex. 5; GIRON00000999-1002			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
96.	Ms. Solis' 2009 Tax Return*	Y. Solis Dep. Ex. 6; GIRON00001029-1034			
97.	Ms. Solis' 2015 Tax Return*	Y. Solis Dep. Ex. 7; GIRON00001090-1093			
98.	Mr. Moya's 2009 Tax Return*	Y. Solis Dep. Ex. 8			
99.	Mr. Saravia-Cruz's Application for Residency	Ex. 20 to Defendants' MSJ; WAPLES00000344			
100.	Mr. Saravia-Cruz's Lease, dated 2/9/12	Ex. 24A to Defendants' MSJ; WAPLES00000254-255			
101.	Mr. Saravia-Cruz's Lease, dated 11/14/12	Ex. 24B to Defendants' MSJ; WAPLES00000252-253			
102.	Mr. Saravia-Cruz's Lease, dated 11/14/12	Ex. 24C to Defendants' MSJ; WAPLES00000250-251			
103.	Mr. Saravia-Cruz's Lease, dated 1/28/14	Ex. 24D to Defendants' MSJ; WAPLES00000247-249			
104.	Mr. Saravia-Cruz's Lease, dated 1/15/15	Ex. 24E to Defendants' MSJ; WAPLES00000211-213			
105.	Mr. Saravia-Cruz's Mobile Home Park Rules & Regulations, dated 2/9/12	Ex. 28A to Defendants' MSJ; WAPLES00000268-273			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
106.	Mr. Saravia-Cruz's Mobile Home Park Rules and Regulations, dated 1/28/14	Ex. 28B to Defendants' MSJ; WAPLES00000258-267			
107.	Mr. Saravia-Cruz Park Policies, Rules and Regulations, dated 1/15/15	Ex. 28C to Defendants' MSJ; WAPLES00000216-221			
108.	2007 TPS Application by Mr. Saravia-Cruz	GIRON00001791-1794			
109.	2010 TPS Application by Mr. Saravia-Cruz	GIRON00001711-1716			
110.	2010 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001722			
111.	2006 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001728			
112.	2006 TPS Application by Mr. Saravia-Cruz	GIRON00001731-1734			
113.	2001 TPS Application by Mr. Saravia-Cruz	GIRON00001746-1750			
114.	2001 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001757			
115.	2005 TPS Application by Mr. Saravia-Cruz	GIRON00001780-1783			
116.	2005 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001785			
117.	Mr. Saravia-Cruz' 7/20/06 Misdemeanor Arrest and Sentence Record	GIRON00001797-1798			
118.	Mr. Saravia-Cruz' 6/5/06 Misdemeanor DWI Record	GIRON00001860-1861			
119.	Mr. Saravia-Cruz' 2/24/07 Misdemeanor Driving under Suspended License Record	GIRON00001862-1863			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
120.	2007 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001799			
121.	2002 Application for Employment Authorization by Mr. Saravia-Cruz	GIRON00001805			
122.	2002 TPS Application by Mr. Saravia-Cruz	GIRON00001806-1809			
123.	Mr. Saravia-Cruz's 2009 Tax Return	H. Saravia-Cruz Dep. Ex. 11; WAPLES00000320-337			
124.	Mr. Saravia-Cruz's 2010 Tax Return	H. Saravia-Cruz Dep. Ex. 12; WAPLES00000299-319			
125.	Ms. Giron de Reyes' ITIN sheet	R. Reyes Dep. Ex. 6; GIRON000000075			
126.	Ms. Solis' Passport*	Y. Solis Dep. Ex. 3; GIRON00000102-104,119			
127.	Ms. Amaya's passport*	R. Amaya Dep. Ex. 5; GIRON00000001-26			
128.	Ms. Giron de Reyes' Passport*	R. Reyes Dep. Ex. 7; GIRON00000992-993			
129.	Ms. Giron de Reyes' Passport*	R. Reyes Dep. Ex. 8; GIRON00000965-966			
130.	2014 Audit Results	M. Jones 30(b)(6) Dep. Ex. 22			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
131.	2016 Audit Results	C. Easton Dep. Ex. 24			
132.	List of Non-Compliant Tenants	WAPLES00001272-1273			
133.	2/11/16 Daily Happenings Report	WAPLES00001435-1437			
134.	1/14/16 Email chain between J. Armstead and C. Easton	WAPLES00002433-2435			
135.	Treasury Inspector General for Tax Administration Report, dated 12/8/09	Ex. 30 to Defendants' MSJ			
136.	7/29/11 Email from Sabiha Noorzai to Dwoskin Daily Reports - Residential	Ex. 32 to Defendants' MSJ; WAPLES00001470			
137.	A.J. Dwoskin & Associates, Inc. 2014 Residential Marketing Plan	Ex. 33 to Defendants' MSJ; WAPLES00001676-1693			
138.	Valerie Dixon 2016 FHA Certificate of Achievement	WAPLES00001257			
139.	Valerie Dixon 2015 FHA Certificate of Achievement	WAPLES00001258			
140.	Carolina Easton 2015 FHA Certificate of Achievement	WAPLES00001259			
141.	Mayra Lopez 2016 FHA Certificate of Achievement	WAPLES00001260			
142.	Jessica Armstead 2016 FHA Certificate of Achievement	WAPLES00001261			
143.	Mark Jones 2016 FHA Certificate of Achievement	WAPLES00001262			
144.	Josephine Giambanco 2016 FHA Certificate of Achievement	WAPLES00001263			
145.	Waples/Bull Run Mobile Home Parks Future Resident Information Guide, dated 5/18/06	M. Jones 30(b)(6) Dep. Ex. 10; WAPLES00000733-734			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
146.	Waples/Bull Run Mobile Home Parks Future Resident Information Guide, dated 4/22/16	WAPLES00000755-756			
147.	A. J. Dwoskin & Associates, Inc. Consumer Reports & CoreLogic SafeRent Training Manual, dated 1/24/11	M. Jones 30(b)(6) Dep. Ex. 8; WAPLES00000572-732			
148.	A.J. Dwoskin & Associates, Inc. Resident Selection & Occupancy Standards, dated 2/19/13	M. Jones 30(b)(6) Dep. Ex. 9; WAPLES000002320-2351			
149.	A.J. Dwoskin & Associates, Inc. Resident Selection & Occupancy Standards, dated 11/1/13	M. Jones 30(b)(6) Dep. Ex. 12; WAPLES000002647-2678			
150.	A.J. Dwoskin & Associates, Inc. Resident Selection & Occupancy Standards, dated 4/20/15	M. Jones 30(b)(6) Dep. Ex. 13; WAPLES000002602-2633			
151.	A.J. Dwoskin & Associates, Inc. Resident Selection & Occupancy Standards, dated 5/8/15	M. Jones 30(b)(6) Dep. Ex. 14; WAPLES000002502-2533			
152.	21/30 Day Notice to Mr. Reyes	R. Reyes Dep. Ex. 3; WAPLES000000432			
153.	1/18/16 Violation Letter to Mr. Moya	WAPLES000001141			
154.	1/18/16 Violation Letter to Mr. Saravia-Cruz	WAPLES000000199			
155.	3/2/16 Violation Letter to Mr. Bolanos	WAPLES000001332			
156.	9/13/16 Letter to S. Pongvichit	WAPLES000001278			
157.	7/19/16 Letter to M. Sandeep Hernandez	WAPLES000001323			
158.	8/16/16 Letter from Josephine Giambanco to Kamala Silwal	WAPLES000001301			

Ex. No.	Description	Bates/Deposition No.	ID	OBJ	ADM
159.	Weinberg Resume	Attached to Defendants' Reply in Support of MSJ as Ex. A to Exhibit 16(1)).			
160.	Weinberg Tables 1-3	Pages 9 – 10 of the Weinberg Expert Report (attached to Defendants' Reply in Support of MSJ as Ex. 16(1) (Dkt. 165-1))			
161.	Weinberg Tables	Ex. 16(2) to Defendants' Reply in Support of MSJ (Dkt. 165-1)			
162.	Caruso Resume	Ex. A to Caruso Expert Report			
163.	Demonstratives				
164.	Enlargements of the above-listed Exhibits				
165.	Summaries of the above-listed Exhibits				

Defendants reserve the right to use any exhibit on Plaintiffs' exhibit list to which Defendants do not object. Further, Defendants reserve the right to use enlargements of any of the exhibits on the list above, as well as summary and demonstrative exhibits as may assist the jury and the Court. Defendants further reserve the right to use additional documents not listed on the attached list for purposes of impeachment and/or rebuttal.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2017, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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